



Robson Forensic

INCORPORATED

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BB&T Bank Building, 4th floor
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Subject: Supplemental Report re: Kitzmiller

Dear Attorney Crim:

Since I authored my report dated February 13, 2006, I conducted a site inspection on April 6, 2006, and reviewed additional materials that included a CD containing PDF copies of documents marked "Butcher 6643-8859", and reviewed others documents sent to me marked "Butcher 3471-4270". You requested that I supplement my original report based upon the information I obtained from those activities. This letter constitutes the requested supplemental report.

My review of the Butcher documents related to inhalation studies (Butcher 3733-3817; 3471-3504; 3505-3604; and 3605-3637) on various products, especially the studies involving industrial hygiene assessments of exposure to quaternary ammonium chloride compounds under "worst case" scenarios, indicates that there is no unreasonable risk of exposure. The "worst case" industrial hygiene scenarios included (a) simulated misuse of the concentrated product in a spray bottle, and (b) a simulated five gallon spill of the concentrated material in a small, unventilated (< 0.1 air change per hour) room.

Industrial hygiene studies reported that quaternary ammonium chloride compounds were not detected in air due to their large particle size (138-190 μm). Particles of those sizes are subject to the forces of gravity and settle out quickly if they became airborne at all. If the particles were inhaled, they would be deposited in the upper respiratory tract and would not be expected to reach the bronchiole or alveolar regions of the lung.

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As the result of my site inspection and review of these additional materials, and within the bounds of reasonable professional certainty and subject to change if additional information becomes available, it is my professional opinion that:

1. The cleaning products tested in the industrial hygiene inhalation studies exhibit a low propensity to volatilize or to aerosolize in a manner that creates an inhalation exposure.
2. There was no unreasonable risk for adverse effects under the "worst case" industrial hygiene testing scenarios using concentrated products containing quaternary ammonium compounds.
3. There would be even less risk associated with the use of diluted products containing quaternary ammonium compounds.
4. The Command Centers dispense quaternary ammonium compound-containing solutions in a diluted form directly into containers.
5. Engineering controls and/or personal protective equipment controls are not necessary to protect custodians from the quaternary ammonium compounds in the Blue Skies II or Bathmate products.
6. The findings in my original report remain unchanged and are enhanced by these new materials.



Digitally Signed By: Ronald D. Schaible

Ronald D. Schaible, CIH, CSP, P.E.